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May 10, 2016

Via ECF

Hon. Steven I. Locke, U.S.M.J.
U.S. Courthouse
100 Federal Plaza, Courtroom 820
Central Islip, NY 11722

Re: Siancas et al. v. Exclusive Detailing Inc. et al.
Docket No.: 2:14-cv-6151

Dear Judge Locke:

This office represents defendants in the above referenced matter. As the court is aware, Michael Agoila, the owner of Exclusive Detailing, Inc. ("EDI") and his wife have filed for bankruptcy (Bankruptcy Docket No. 16-13291). We respectfully submit this correspondence as notice to the Court that, in light of this lawsuit and the numerous other lawsuits recently filed against defendant (EDI), our client has been forced into seeking Bankruptcy protection pursuant to 11 U.S. Code Chapter 7. The filing date of EDI's bankruptcy petition was Monday, May 9, 2016, under Bankruptcy Docket No. 16-19065.

In good faith, our client diligently sought alternatives to filing for Bankruptcy, but their present state of financial affairs renders them incapable of defending these lawsuits or meeting their other outstanding financial obligations. As such, it is respectfully submitted that the above referenced matter is stayed, pursuant to the Bankruptcy protection afforded under 11 U.S.C. 362(a)(1). If the court requires any additional information, please kindly contact my office.

Thank you for your consideration and courtesies.

Respectfully submitted,

Michael K. Chong

Michael K. Chong, Esq.

MKC/

cc: Steven Moser, Esq. (Plaintiff's counsel)
James McGrath, Esq. (Co-Defendants' counsel)